STATE BOARD OF ELECTIONS STATE OF ILLINOIS

2329 S. MacArthur Blvd. Springfield, Illinois 62704-4503 217/782-4141 TTY: 217/782-1518 Fax: 217/782-5959

James R. Thompson Center 100 W. Randolph St., Ste. 14-100 Chicago, Illinois 60601-3232 312/814-6440 TTY: 312/814-6431

Fax: 312/814-6485



BOARD MEMBERS

William M. McGuffage

Brvan A. Schneider

Casandra B. Watson

Harold D. Byers Betty J. Coffrin Ernest L. Gowen

Jesse R. Smart, Chairman

Charles W. Scholz, Vice Chairman

EXECUTIVE DIRECTOR

Rupert T. Borgsmiller

AGENDA

State Board of Elections Sitting as the Duly Authorized **State Officers Electoral Board** Monday, December 30, 2013 1:00 p.m.

James R. Thompson Center – Suite 14-100 Chicago, Illinois and via videoconference 2329 S. MacArthur Blvd. Springfield, Illinois

Call State Board of Elections to order.

- 1. Recess the State Board of Elections and convene as the State Officers Electoral Board.
- 2. Consideration of subpoena requests in connection with objections to candidate nominating petitions of established party candidates;
 - Wharton, Smith & Wang v. Hardiman & Donald, 13SOEBGP511; a)
 - Mullen v. Goel, 13SOEBGP514.
- 3. Objections/Candidate withdrawn - informational.
- 4. Other business.
- 5. Recess as the State Officers Electoral Board until January 3, 2014 (if necessary) at 9:30 a.m. or until call of the Chairman whichever occurs first.
- Reconvene as the State Board of Elections. 6.
- 7. Other business.
- 8. Adjourn until January 3, 2014 (if necessary) at 9:30 a.m. or until call of the Chairman whichever occurs first.

MICHELLE WHARTON, BRENDA F. SMITH, and LING-YI MARGOT WANG,)
Petitioners-Objectors,)
v.) No. 13 SOEB GP 511
TIO HARDIMAN and BRUNELL DONALD,	
Respondents-Candidates.	

NOTICE OF FILING

TO: State Officers Electoral Board

c/o Steve Sandvoss

100 W. Randolph Street, 14-100

Chicago, IL 60601

SSandvoss@elections.il.gov

Randy Crumpton

Attorney for Respondents-Candidates

70 W. Madison Street, Suite 1400

Chicago, IL 60602

rancrump@aol.com

Barbara Goodman Hearing Officer

barb@barbgoodmanlaw.com

PLEASE TAKE NOTICE that on December 23, 2013, the undersigned caused to be filed with the State Officers Electoral Board **REQUEST FOR SUBPOENAS**, a copy of which is attached hereto and herewith served upon you.

Burton S. Odelson

Burton S. Odelson ODELSON & STERK, LTD.

3318 W. 95th Street

Evergreen Park, IL 60805 Work: (708) 424-5678

Fax: (708) 424-5755

E-mail: attyburt@aol.com

James P. Nally

JAMES P. NALLY, P.C.

8 South Michigan Avenue, Suite 3500

Chicago, IL 60603

Work: (312) 422-5560

Fax: (312) 346-7999

E-Mail: jpnlaw@att.net

PROOF OF SERVICE

I, Burton S. Odelson, an attorney, hereby certify that I caused a copy of the above to be served on the aforementioned parties via e-mail before 3:00 p.m. on December 23, 2013.

Burton S. Odelson

MICHELLE WHARTON, BRENDA F. SMITH, and LING-YI MARGOT WANG,	
Petitioners-Objectors,)
v.) No. 13 SOEB GP 511
TIO HARDIMAN and BRUNELL DONALD,	
Respondents-Candidates.)

REQUEST FOR SUBPOENAS

NOW COME the Petitioners-Objectors, Michelle Wharton, Brenda F. Smith and Ling-Yi Margot Wang ("Objectors'), by and through their attorneys, Burton S. Odelson of Odelson & Sterk, Ltd. and James P. Nally, P.C., and pursuant to Rule 8, request the following Subpoenas be issued by the State Officers Electoral Board:

- 1. Thomas Mastin (666 signatures), 7959 S. Paulina Street, Chicago, IL 60620;
- 2. Legia King (422 signatures), 8153 S. Colfax Avenue, Chicago, IL 60617;
- Jerry Norvell (380 signatures), 1527 E. 62nd Street, Chicago, IL 60637: 3.
- Leroy Dinkins (344 signatures), 207 S. Whipple Street, Chicago, IL 60612; 4.
- Patrice Allen (295 signatures), 8022 S. Ellis Avenue, Chicago, IL 60619; 5.
- Timothy Lee (286 signatures), 4017 W. Monroe Street, Chicago, IL 60624; 6.
- Cynthia Guerrero (252 signatures), 6743 S. 31st Street, Berwyn, IL 60402; 7.
- Cecil Lyles, Jr. (250 signatures), 5488 W. Cortez Street, Chicago, IL 60651; 8.
- Mae McLeninen (222 signatures), 6716 S. Merrill Avenue, Chicago, IL 60649; 9.
- Clyde McLemore (178 signatures), 2815 Ezekiel Avenue, Zion, IL 60099; 10.
- 11. Richard Stewart (175 signatures), 4139 S. Ellis Avenue, Chicago, IL 60653;
- Andrea Maples (170 signatures), 4250 W. North Avenue, Chicago, IL 60639; 12.
- 13. Dwight McConnell (167 signatures), 3300 W. Maypole Avenue, #220, Chicago, IL 60624;
- Beverly Smith (165 signatures), 8233 S. Ingleside Avenue, Chicago, IL 60619; 14.
- 15. Carla Clair (146 signatures), 7457 S. Coles Avenue, Chicago, IL 60649;
- Ferial Jackson (115 signatures), 1304 S. 9th Avenue, Maywood, IL 60153; 16.
- Bobby Hamilton (114 signatures), 3337 W. Madison Street, Chicago, IL 60624; 17.
- 18. Derrick Jones (129 signatures), 1220 S. Homan Avenue, Chicago, IL 60623; and
- 19. Angela Balls (47 signatures), 3440 W. Franklin Blvd., Chicago, IL 60624.
- 1. The above specified circulators are alleged to have participated in a pattern of fraud when gathering signatures. Each of the circulators has many signatures on their petition

sheets which are not the true and correct signature of the purported person. These signatures have been found invalid by the Board's record examination clerks. Further inquiry is necessary to further substantiate the pattern of fraud and false swearing by these circulators.

- 2. The Objectors include three of circulator Timothy Lee's sheets as an illustration.
- 3. The Objectors also request a subpoena be issued for Angela Balls of 3440 W. Franklin Blvd., Chicago, IL 60624 since one of the allegations made against her is that there is no such person, as well as Derrick Jones, 1220 S. Homan Avenue, Chicago, IL 60623 and Bobby Hamilton, 3337 W. Madison Street, Chicago, IL 60624, both of whom do not live at those residence addresses.
- 4. The Objectors request that this subpoena request be acted upon as quickly as possible so sufficient time to find the circulator is given. If the approval of the request is made after Friday, December 27, 2013, the Objectors may not be able to serve the circulators in time for the January 3, 2014 hearing.
- 5. Objectors respectfully request that upon recommendation of the Hearing Examiner, the Chairman of the Electoral Board issue the subpoenas by whatever means are available in order to allow sufficient time for process of service, or continue the hearing from January 3, 2014 to January 6 or 7, 2014, if the subpoenas are not authorized until after December 27, 2013.
- 6. Objectors also request that subpoena or witness fees be waived since there are no amounts in the Rules, or, in the alternative, any fees be allowed to be tendered at the hearing upon the appearance of the circulator subpoenaed.

WHEREFORE, the Objectors respectfully request that their Request for Subpoenas, per Rule 8, be granted.

Respectfully submitted,

Burton S. Odelson, one of Objectors' attorneys

Burton S. Odelson ODELSON & STERK, LTD. 3318 W. 95th Street Evergreen Park, IL 60805 Work: (708) 424-5678

Fax: (708) 424-5755

E-Mail: attyburt@aol.com

James P. Nally JAMES P. NALLY, P.C. 8 South Michigan Avenue, Suite 3500 Chicago, IL 60603 Work: (312) 422-5560

Fax: (312) 346-7999 E-Mail: jpnlaw@att.net

										BIND	HERE
--	--	--	--	--	--	--	--	--	--	------	------

DEMOCRATIC PRIMARY PETITION

We, the undersigned, members of and affiliated with the DEMOCRATIC Party and qualified primary electors of the DEMOCRATIC Party, in the State of Illinois, do hereby petition that the following named persons shall be candidates of the DEMOCRATIC Party for the nomination for the offices hereinafter specified, to be voted for at the primary election to be held on the Eighteenth (18th) day of March, 2014.

NAME	ADDRESS	OFFICE	on the Eighteenth (18th) DISTRICT	PARTY
	233 N. IRVING AVENUE		STATE OF	
Tio Hardiman	HILLSIDE, ILLINOIS 60162	GOVERNOR	ILLINOIS	DEMOCRATIC
Brunell Donald	913 East 54th STREET CHICAGO, ILLINOIS 60615	LIEUTENANT GOVERNOR	STATE OF ILLINOIS	DEMOCRATIC
NAME (voter's signature)	PRINT NAME		EET ADDRESS RR NUMBER	CITY, TOWN COUNTY OR VILLAGE
Curtin Miller			-ADAMS	CHI CONC
2 angie Coop			V-Washington	1540
· Warre with	er Wayne Withou	3 5052- W	- Movene	CHi Cook
Dita M	m CAR JONUSO	N 16-N-1	ong 1	CH (60)
1200	p teter flags	123. N-1	CENTRAL	CH1 600 K
Dolly Day	1 0 11	3624-V	1- MOURUE	CHI COOK
· Ronnie Bra	Range Park	117419	W- ADams	CHI CON
· Alicelas &	n SHI - Coule	2/2-1V-	Austin	CHI COOK
10 Deans En	m Diawa Fira	4 1	1 ough	CHU Cook
" (llice Coop	11		Austin	CHI cock
12 Neil your	NELL Your	10 24-N	loreh	ch cook
12 Tommer Col	Myer Today God	Bun 2815-	W - Indisan	CHI Cod
14 Keny Ford	Kim Ford	16-N-1	Naller	chi cook
18 Gackie Sh	our Jackle 34	and 18-12.	Austro	che cook
18 Mike Bro	wo MUKZ Brown	n 24. W-	Masau	all Code
17 Richy Don	es Ricky Jon	18\$ 3822	M-ADans	CHI Cook
18 Derlez Write	Dexten Welte	2224-1	JACKSON	OHi cook
10 Rouly Guin	of Rowly your	a 51542.1	newashingto	CILI cook
20 Charle le of	age Auter Walk	En 1936: 1	v- Morric	Chi Goog
" Wensell	char Denlos Wa	-1K-19-N	Larel	en' cod
2 day for		es 136 EN	- May tool	D C 1 (00)
24 Kan S X al	1	. سا	of the country	Ochi Charle
25 Cary Decay	LON LARRY Town		May rue 10	ah'i cer
	mest cured tedro	2 5 189-1	we work	N II OVER
STATE OF ILLINOIS, SECONTY OF COOK STATE OF ILLINOIS, SECOND SECO	s.	•		
I, (Print Name of Circulator)	, do hereby certify	1	UITW: Address)	Massing.
(Print Name of Circulator) in the City/Village/Unincorpora	ated Area (circle one) of fundamental Reims (fundamental Reims) ears of age or older, that I am a citizen	nice any that provides postal sen	D Cade Lallan & County	of CHORY.
my presence, not more than 90	days preceding the last day for filing o	of the petitions and are go	enuine and that to the best	of my knowledge and
belief the persons so signing w	ere at the time of signing the petition of nomination, and that their respective	qualified voters of the Di	EMOCRATIC Party in the	e political division in
		Link	1 som	
· ·	1 10 1	0	ignature of Circulator)	• • • • • • • • • • • • • • • • • • • •
Signed and swom to (or affirm		before me, on	Nov (X	,2013
OFFICIAL I	A.U. P	Nun	A. (10 Li	
Notary Pu '10 - Si SEANy Commission Expi	tate of Illinois	580	(Notal) Public)	
SHAN)GOMMISSION EXPI	SHEET NO.	200	PROGRE	SS PRINTING •

	_				RII	٧D	HERE				

DEMOCRATIC PRIMARY PETITION

We, the undersigned, members of and affiliated with the DEMOCRATIC Party and qualified primary electors of the DEMOCRATIC Party, in the State of Illinois, do hereby petition that the following named persons shall be candidates of the DEMOCRATIC Party for the nomination for the offices hereinafter specified, to be voted for at the primary election to be held on the Eighteenth (18th) day of March, 2014.

NAME	ADDRESS		OFFICE	DISTRICT	PARTY		
Tio Hardiman		IVING AVENUE ILLINOIS 60162	GOVERNOR	STATE OF ILLINOIS	DEMOCRATIC		
Brunell Donald	MENUTE MENUTE IN THE PROPERTY OF THE PERSON NAMED IN THE PERSON NA		LIEUTENANT GOVERNOR	STATE OF ILLINOIS	DEMOCI	RATIC	
NAME (voter's signature)		PRINT NAME	STRI	EET ADDRESS RR NUMBER	CITY, TOWN OR VILLAGE	COUNTY	
· Shew Cop	She	cel Cox.	17-N-A	ustin	QUI	Cook	
· Worlley Win	te Wal	lag Write	223-N	-Central	eus	oad	
· Karer Ulou	de karo	eductions	16-12	licer	CH2	Cond	
· Kico Ban	As RI	eo Briks	5052-W	- Congress	Q.	ade	
· Larry Thur	est Ez	key Jermas	171-3-	MayfrelD	Chi	Cook	
· Jarry Pox	2 60	Cey Cox	16-N-	Long	2/21	Qook	
" Kened delim	m Ro	use Kobinso	a 7-U-7	roop	CAL	Cace 1	
· Rovette Roly	res Roc	zHa Rebinse	~ 16-N-A	omiljus	du.	Cuel	
· Sherman	derice St	gener pour	2 485-N-1	Just in	P#/	Cook	
10 Kay Coopel	1 Ka	y Coppe	- 1950-1	V- KenBirta	Gki	Code	
" Destar Open	25/1/20	xto Dave		Ozotezi		God	
" Aller Mer	an 3	39- W. May	15 on 2734 h	14(101)1sav	CM:	Bell	
" Konall Br	own Ro	end Bear		WONBHAZA	CHI	200	
" How Cooks	ma	Wed Cooks	36-N-A	with	SW	Cook	
" Resour Bos	My Rec	ight Book	3 18-11-	Muster	C.M.	Cook,	
" Lawy Dar	Mid Da	ny Sous	2 18-11-1	Austha	Chi !	at	
" Child may	4/00	JA- DARTER	- 44.10-n	0 'Washington	CH	Cook	
" pusamua	Licon Sev	en walk	z 122 - W	Crarkey	Ch!	AND Y	
" The Bank	ST KI	In BOTUL	7 334-11	- Mustic	chi	(Jesel)	
" Urore Ubl	ger for	THE MONKER	5055-W	1 Congress	CAL	Cock	
" Dumy Bow	Val 1	my Boul-	3 3 5 N	CANGE _	CMI	Cook	
2 Hammer June	com Or	عيس	say 2-1-10-	Mergal)	CHY	Cock	
" Daws Eva		als Exelections	77	Corel	CAR	Coak	
" Roosevell'	nepon	ESECCH APPE	12/4 16"N"	taks (CW.	100	
" Larry por	er sa	ary por	8611X-8-	ALTERATED TA	CKE	الكحار	
STATE OF ILLINOIS.		t					
COUNTY OF COOK				46171	uh.		
(Print Name of Ciculator)	XET_	, do hereby certify	,	700 Mariantes	ZUUS	102	
in the City/Village/Unincorpora State of Illinois, that I am 18 ye	•	/If the management and that man		(P Code County		<u>~</u> .	
my presence, not more than 90	days preceding	the last day for filing of	of the petitions and are go	enuine and that to the best	of my knowl	edge and	
belief the persons so signing w which the candidates are seekin	ere at the time of a nomination, ar	of signing the petition of that their respective	qualified voters of the D	EMOCRATIC Party in the sated as above set forth.	e political di	vision in	
			South	an		-	
		1		Signature of Circulator)			
Signed and swom to (or affirme	d) by Lin	rothy Lee	before me, on	Nov 18		2013	
		(Name of Girculator)	N.	(Insert Ponth; day)			
OFFICIAL SEA NINA JALIL	1		109	(Notary Hublic)			
(SENetery Public - State of My Commission Expires (or illinois Oct 28, 2015	sheet no.≥	81	PROVERE	SS PRINTING ••	CONTRACTOR OF THE PARTY OF THE	

 	. BIND	HERR	

DEMOCRATIC PRIMARY PETITION

We, the undersigned, members of and affiliated with the DEMOCRATIC Party and qualified primary electors of the DEMOCRATIC Party, in the State of Illinois, do hereby petition that the following named persons shall be candidates of the DEMOCRATIC Party for the nomination for the offices hereinafter specified, to be voted for at the primary election to be held on the Eighteenth (18th) day of March, 2014.

NAME	ADDRESS	OFFICE	DISTRICT	PARTY
Tio Hardiman	233 N. IRVING AVENUE HILLSIDE, ILLINOIS 60162	GOVERNOR	STATE OF ILLINOIS	DEMOCRATIC
Brunell Donald	913 East 54th STREET CHICAGO, ILLINOIS 60615	LIEUTENANT GOVERNOR	STATE OF Illinois	DEMOCRATIC
NAME (voter's signature)	PRINT NAME	STHE	ET ADDRESS RR NUMBER	CITY, TOWN COUNTY OR VILLAGE
Jone Town	TON! Towns	2724-1	w-fultor	CHI Corok
· Campie Ha	11 Course Hall	15-N-L	arel	Older Book
Roubly Hay	ex RonDy Hages	17-N- L	enel	chi Rost
· Duble Col	lins Bern Da Colla	(as 4.9-000.	w Dons	Chi Cook
· Koum Cont	En Keul Caretre	C 8482-1	ur Morack	ah cook
· course	mes Watter Dimm	18-12	لوبه	chi Cook
vocavi sieno	your Dept train	1922-	W-XIlleax	en Rook
· women wal	Fan Souly Walker	- W-U-A	ussia	end eas
· jony viole	in long WATKIN	3 246-1V-	Pluz	CHI Cook
· Rollin Class	the Kalley Wast	(12/5 200 N.	Lock wood	041 Cook
China Wal	King do 1 Cou	10 N	Loug.	CH! Coul
- Hunkog	ras Krith Koge	C3 3810-1	Ve Algrays	elfi Cede
mines Hang	Kum Congle Hours	in 116-N-	certify	1717 Cag
- uniquel clude	non Alecture Davis	ca 3220-1	N-Musquista	CHE CON
hua Cain	KI a Caru	10-5-N	MAYTISTO	CHI Call
Onsela Mark	Carola Strate	12-5-1	WAY DEWY	Str Cogl
1,18	my bogue ela della	0/-30	Mary	CHI Cask
· Kevin Will	10 Karing 10 mm) du u	Name	.0.3
Dawn	The way was the	32 3	1125000	111 500
Soport Dill	ard Easer Dillow	101-3	Mason	010
BINIT	DATE I THE	2 28 67	MASON	CHI CON
REALINE	Land Dilly William	1100 00 0	WASON -	CHI Cook
· ·	DICKY DIV	THE T	-10 1310	in cur ca
3				
TATE OF ILLINOIS, OUNTY OF COOK Trint Name of Greulator) tae City. "Illage/Unincorpora	en do hereby certify		UIT W. M.	CONTUR.
at of Illinois that Yam 19 44	ted Area (circle one) of	nidefailty that provides poetal serv	P Code ASA County	of,
y private, not more than 90 lies use persons so signing w	ears or age or older, that I am a crizen a days preceding the last day for filing of ere at the time of signing the petition of g nomination, and that their respective in	of the petitions and are ge qualified voters of the DI	nuine and that to the best MOCRATIC Party in th	of my knowledge and
		- Wate	Ignative of Choulanter)	
med and swom to (or affirme		before me, on	Nov 18	,2013
OFFICIAL S MNA JAL Notary Public - Sta	IL te of Illinois	- Nina	(insert month, day) Solarly Public)	,
SEMY Commission Expin	se Oct 28, 2015 SHEET NO.		U	SS PRINTING O

MICHELLE WHARTON, BRENDA F. SMITS and LING-YI MARGOT WANG,	H,)		
Petitioners-Objectors,)		
v.))	No. 13	3 SOEB GP 511
TIO HARDIMAN and BRUNELL DONALD,)).		
Respondents-Candidates.))		
SUI	BPOENA		
To: Thomas Mastin, 7959 S. Paulina Street, Ch	icago, IL 6	0620	
(Name) (Address)			
X YOU ARE COMMANDED to appear to to Electoral Board on <u>January 3, 2014</u> , at 9:0 Building, 100 W. Randolph, Suite 14-100, C	<u>0 o'clock a</u>	<u>m.</u> , at	the Thompson Center, State of Illinois
☐ YOU ARE COMMANDED to produce and produce and produce and the place, date and time specifies			
YOUR FAILURE TO APPEAR IN RESPONSE TO PUNISHMENT FOR CONTEMPT OF COURT A			
Issue	ed:	Date:	
Attorney Name: Odelson & Sterk, Ltd. Attorney For: Objectors Address: 3318 W. 95 th Street City: Evergreen Park, IL 60805 Telephone: 708/424-5678		Ву:	Jesse R. Smart Chairman, Electoral Board
PROOF	OF SERV	<u>CE</u>	
I,, being first duly sword (certified mail, return receipt requested/handling a, 2013.	rn, depose :	and sta	ate that I served this subpoena byon
SUBSCRIBED AND SWORN to before me this day of, 2013.			
Notary Public			

	IELLE WHARTON, BRENDA F. SMI ING-YI MARGOT WANG,	(TH,)		
	Petitioners-Objectors,)		
v.)	No. 1	3 SOEB GP 511
TIO H	IARDIMAN and BRUNELL DONALI) ,)		
	Respondents-Candidate	es.)		
	<u>S</u>	<u>UBPOENA</u>		
To:	Legia King, 8153 S. Colfax Avenue, Chic (Name) (Address)		7	
X	YOU ARE COMMANDED to appear to Electoral Board on <u>January 3, 2014</u> , at 9 Building, 100 W. Randolph, Suite 14-100	0:00 o'clock a	<u>.m.</u> , at	the Thompson Center, State of Illinois
	YOU ARE COMMANDED to produce an of objects at the place, date and time speci			
	R FAILURE TO APPEAR IN RESPONSE SHMENT FOR CONTEMPT OF COURT			
	Iss	sued:	Date:	Name of the Control o
Attorn	ney Name: Odelson & Sterk, Ltd.		By:	
Attorn Addre City:	ney For: Objectors less: 3318 W. 95 th Street Evergreen Park, IL 60805 none: 708/424-5678		- y -	Jesse R. Smart Chairman, Electoral Board
	PROC	OF OF SERV	<u>ICE</u>	
(certif	, being first duly sv ied mail, return receipt requested/handlin , 2013.	vorn, depose ng a copy) to	and st	ate that I served this subpoena byon
	CRIBED AND SWORN to before me day of, 2013.			
***	Notony Dublic			

	IELLE WHARTON, BRENDA F. ING-YI MARGOT WANG,	SMITH,)		
	Petitioners-Object	ors,		
v.)	No. 13	3 SOEB GP 511
TIO E	IARDIMAN and BRUNELL DON	NALD,)		
	Respondents-Cand	lidates.)		
		SUBPOE	NA	
To:	Jerry Norvell, 1527 E. 62 nd Street, C (Name) (Add	<u>Chicago, IL 60</u> Iress)	637	
X		4, at <u>9:00 o'clo</u>	ock a.m., at	Hearing Examiner of the State Officers the Thompson Center, State of Illinois 50601.
				and copying of the following documents uments, objects and place of inspection):
	R FAILURE TO APPEAR IN RESPO SHMENT FOR CONTEMPT OF CO			
		Issued:	Date:	
Attorn	ney Name: Odelson & Sterk, Ltd.		By:	
Attorn Addre	ney For: Objectors ss: 3318 W. 95 th Street		·	Jesse R. Smart Chairman, Electoral Board
	Evergreen Park, IL 60805 none: 708/424-5678			
	<u>I</u>	PROOF OF S	ERVICE	
(certif	, being first do heing first do hein	uly sworn, de _l andling a copy	pose and stands to	ate that I served this subpoena byon
	CRIBED AND SWORN to before me day of, 2013.	e		
	Notary Public			

MICHELLE WHARTON, BRENDA F. SM and LING-YI MARGOT WANG,	MITH,)		
Petitioners-Objectors	, , _{, , , ,} ,		
v.)	No. 1	3 SOEB GP 511
TIO HARDIMAN and BRUNELL DONAL	L D ,)		
Respondents-Candida	ates.)		
	SUBPOEN	NA.	
To: <u>Leroy Dinkins, 207 S. Whipple Street,</u> (Name) (Address		60612	
X YOU ARE COMMANDED to appear Electoral Board on <u>January 3, 2014</u> , at Building, 100 W. Randolph, Suite 14-1	t <u>9:00 o'cloc</u>	<u>:k a.m.,</u> at	the Thompson Center, State of Illinoi
YOU ARE COMMANDED to produce of objects at the place, date and time spe			
YOUR FAILURE TO APPEAR IN RESPONS PUNISHMENT FOR CONTEMPT OF COUR			
	Issued:	Date:	
Attorney Name: Odelson & Sterk, Ltd.		By:	
Attorney For: Objectors Address: 3318 W. 95 th Street City: Evergreen Park, IL 60805 Telephone: 708/424-5678		_ , ,	Jesse R. Smart Chairman, Electoral Board
PRO	OOF OF SE	RVICE	
I,, being first duly (certified mail, return receipt requested/handl, 2013.	sworn, depo	ose and sta to	ate that I served this subpoena byon
SUBSCRIBED AND SWORN to before me this, 2013.		CATTO DARMINISTANCE AND A	
Notary Public			

	HELLE WHARTON, BRENDA F. SM LING-YI MARGOT WANG,	MTH,)					
	Petitioners-Objectors,)					
v.)	No. 13	3 SOEB GP 511			
TIO	HARDIMAN and BRUNELL DONAL	LD,)					
	Respondents-Candida	ites.					
		SUBPOE	<u>NA</u>				
To:	Patrice Allen, 8022 S. Ellis Avenue, Ch. (Name) (Address		0619				
X	YOU ARE COMMANDED to appear to testify before the Hearing Examiner of the State Officer Electoral Board on <u>January 3, 2014</u> , at <u>9:00 o'clock a.m.</u> , at the Thompson Center, State of Illinoi Building, 100 W. Randolph, Suite 14-100, Chicago, Illinois 60601.						
	YOU ARE COMMANDED to produce a of objects at the place, date and time spe						
	R FAILURE TO APPEAR IN RESPONS SHMENT FOR CONTEMPT OF COUR						
]	ssued:	Date:				
Attor Addr City:	rney Name: Odelson & Sterk, Ltd. rney For: Objectors ess: 3318 W. 95 th Street Evergreen Park, IL 60805 shone: 708/424-5678		Ву:	Jesse R. Smart Chairman, Electoral Board			
	PRO	OF OF SE	ERVICE				
(certi	, being first duly s fied mail, return receipt requested/handl , 2013.	sworn, dep ing a copy)	ose and sta	nte that I served this subpoena byon			
	SCRIBED AND SWORN to before me day of, 2013.						
	Notary Public						

MICHELLE WHARTON, BRENDA F. SMITH and LING-YI MARGOT WANG,	[,))	
Petitioners-Objectors,)	
v.) No. 1	3 SOEB GP 511
TIO HARDIMAN and BRUNELL DONALD,)	
Respondents-Candidates.)	
SUB	POENA	
To: Timothy Lee, 4017 W. Monroe Street, Chica (Name) (Address)	go, IL 60624	
X YOU ARE COMMANDED to appear to tes Electoral Board on <u>January 3, 2014</u> , at <u>9:00</u> Building, 100 W. Randolph, Suite 14-100, Cl	o'clock a.m., a	t the Thompson Center, State of Illinoi
YOU ARE COMMANDED to produce and pe of objects at the place, date and time specified		
YOUR FAILURE TO APPEAR IN RESPONSE TO PUNISHMENT FOR CONTEMPT OF COURT AS		
Issued	l: Date:	·
Attorney Name: Odelson & Sterk, Ltd. Attorney For: Objectors Address: 3318 W. 95 th Street City: Evergreen Park, IL 60805 Telephone: 708/424-5678	By:	Jesse R. Smart Chairman, Electoral Board
PROOF (OF SERVICE	
I,, being first duly sworn (certified mail, return receipt requested/handling a, 2013.	n, depose and st copy) to	ate that I served this subpoena byon
SUBSCRIBED AND SWORN to before me this, 2013.		
Notary Public		

	IELLE WHARTON, BI ING-YI MARGOT WA		H,)		
	Petitione	ers-Objectors,)		
v.)	No. 1	3 SOEB GP 511
TIO H	IARDIMAN and BRUN	NELL DONALD,)		
	Respond	lents-Candidates.)		
		SUE	BPOENA	•	
To:	Cynthia Guerrero, 6743 (Name)	S. 31 st Street, Berw (Address)	yn, IL 60	402	
X		<u>uary 3, 2014,</u> at <u>9:00</u>	0 o'clock	<u>a.m.,</u> at	Hearing Examiner of the State Officers the Thompson Center, State of Illinois 50601.
					and copying of the following documents uments, objects and place of inspection):
	R FAILURE TO APPEAR SHMENT FOR CONTEM				ENA MAY SUBJECT YOU TO Y LAW.
		Issue	ed:	Date:	
Attorn Addre City:	ney Name: Odelson & Ster ney For: Objectors ss: 3318 W. 95 th Street Evergreen Park, IL 6080 none: 708/424-5678			By:	Jesse R. Smart Chairman, Electoral Board
		PROOF	OF SER	VICE	
I,(certif	, b. ied mail, return receipt re , 2013.	eing first duly swor equested/handling a	n, depose copy) to	and st	ate that I served this subpoena byon
	CRIBED AND SWORN to			**************************************	
	Notary Public				

	HELLE WHARTON, BRENI LING-YI MARGOT WANG,	OA F. SMITH,)			
	Petitioners-O	bjectors,))			
v.) No. 1	3 SOEB GP 511		
TIO	HARDIMAN and BRUNELL	DONALD,))			
	Respondents-	Candidates.))			
		SUBP	<u>OENA</u>			
To:	Cecil Lyles, Jr., 5488 W. Corte (Name)	ez Street, Chica (Address)	go, IL 60651			
X	YOU ARE COMMANDED to appear to testify before the Hearing Examiner of the State Officers Electoral Board on <u>January 3, 2014</u> , at <u>9:00 o'clock a.m.</u> , at the Thompson Center, State of Illinois Building, 100 W. Randolph, Suite 14-100, Chicago, Illinois 60601.					
				and copying of the following documents uments, objects and place of inspection):		
	R FAILURE TO APPEAR IN R ISHMENT FOR CONTEMPT O					
		Issued:	Date:			
Attor Addr City:	rney Name: Odelson & Sterk, Ltd rney For: Objectors ress: 3318 W. 95 th Street Evergreen Park, IL 60805 ohone: 708/424-5678	d.	Ву:	Jesse R. Smart Chairman, Electoral Board		
		PROOF O	F SERVICE			
	, being fified mail, return receipt request, 2013.	irst duly sworn, ed/handling a co	depose and st opy) to	ate that I served this subpoena byon		
	SCRIBED AND SWORN to befo day of, 2					
	Notary Public					

	HELLE WHARTON, BRENDA F. SMITH, ING-YI MARGOT WANG,	,))			
	Petitioners-Objectors,)			
v.)) No. 1	3 SOEB GP 511		
TIO I	HARDIMAN and BRUNELL DONALD,)			
	Respondents-Candidates.)			
	SUBF	<u>POENA</u>			
To:	Mae McLeninen, 6716 S. Merrill Avenue, Ch (Name) (Address)	icago, IL 6064	9		
X	YOU ARE COMMANDED to appear to testify before the Hearing Examiner of the State Officer Electoral Board on <u>January 3, 2014</u> , at <u>9:00 o'clock a.m.</u> , at the Thompson Center, State of Illino Building, 100 W. Randolph, Suite 14-100, Chicago, Illinois 60601.				
	YOU ARE COMMANDED to produce and pe of objects at the place, date and time specified				
	R FAILURE TO APPEAR IN RESPONSE TO SHMENT FOR CONTEMPT OF COURT AS				
	Issued	: Date:			
Attori	ney Name: Odelson & Sterk, Ltd.	By:			
Attori Addre City:	ney For: Objectors ess: 3318 W. 95 th Street Evergreen Park, IL 60805 hone: 708/424-5678	·	Jesse R. Smart Chairman, Electoral Board		
	PROOF O	F SERVICE			
(certif	, being first duly sworn need mail, return receipt requested/handling a december 1, 2013.	, depose and st copy) to	tate that I served this subpoena byon		
	CRIBED AND SWORN to before me day of, 2013.				
	Notary Public				

MICHELLE WHARTON, BRENDA F. SM and LING-YI MARGOT WANG,	MITH,)				
Petitioners-Objectors	,)				
V.)	No. 1	3 SOEB GP 511		
TIO HARDIMAN and BRUNELL DONAL	L D ,)				
Respondents-Candida	ates.)				
	SUBPOENA	<u>\</u>			
To: Clyde McLemore, 2815 Ezekiel Avenue (Name) (Address		099			
Electoral Board on January 3, 2014, a	YOU ARE COMMANDED to appear to testify before the Hearing Examiner of the State Office Electoral Board on <u>January 3, 2014</u> , at <u>9:00 o'clock a.m.</u> , at the Thompson Center, State of Illino Building, 100 W. Randolph, Suite 14-100, Chicago, Illinois 60601.				
YOU ARE COMMANDED to produce of objects at the place, date and time spe					
YOUR FAILURE TO APPEAR IN RESPONS PUNISHMENT FOR CONTEMPT OF COUR					
	Issued:	Date:			
Attorney Name: Odelson & Sterk, Ltd.		By:			
Attorney For: Objectors Address: 3318 W. 95 th Street City: Evergreen Park, IL 60805 Telephone: 708/424-5678		•	Jesse R. Smart Chairman, Electoral Board		
PRO	OOF OF SER	<u>VICE</u>			
I,, being first duly (certified mail, return receipt requested/hand, 2013.	sworn, depos ling a copy) to	e and st	ate that I served this subpoena byon		
SUBSCRIBED AND SWORN to before me this day of, 2013.					
Notary Public					

	HELLE WHARTON, BRENDA F JING-YI MARGOT WANG,	. SMITH,)			
	Petitioners-Object	ors,)			
v.	•)	No. 1	3 SOEB GP 511	
TIO I	HARDIMAN and BRUNELL DO	NALD,			
	Respondents-Can) didates.)			
		SUBPOE	<u>NA</u>		
To:	Richard Stewart, 4139 S. Ellis Aver	nue Chicago I	T. 60653		
		dress)	11 00035		
X	YOU ARE COMMANDED to app Electoral Board on <u>January 3, 2019</u> Building, 100 W. Randolph, Suite 1	<u>4, at 9:00 o'clo</u>	<u>ck a.m.,</u> at	the Thompson Cent	
	YOU ARE COMMANDED to produce of objects at the place, date and time				
	R FAILURE TO APPEAR IN RESPO SHMENT FOR CONTEMPT OF CO				r you to
		Issued:	Date:		Annie skriver von der gele 170 km Thi der de 1800 de la
	ney Name: Odelson & Sterk, Ltd.		By:		
Addre	ney For: Objectors ess: 3318 W. 95 th Street Evergreen Park, IL 60805 hone: 708/424-5678			Jesse R. Smart Chairman, Elector	al Board
	<u> </u>	PROOF OF SE	RVICE		
(certif	, being first d fied mail, return receipt requested/ha , 2013.	uly sworn, dep indling a copy)	ose and sta	ate that I served this	subpoena byon
SUBS	CRIBED AND SWORN to before m	e	April Marie Control of the Control o		
	day of, 2013.				
	Notary Public				

	HELLE WHARTON, BREND JING-YI MARGOT WANG,	A F. SMITH	,))				
	Petitioners-Ok	ojectors,)				
v.)) No	. 13 SOE	B GP 511		
TIO I	HARDIMAN and BRUNELL	DONALD,)				
	Respondents-	Candidates.)				
		<u>SUBI</u>	POENA				
To:	Andrea Maples, 4250 W. North		cago, IL 606	39	And the state of t	oranga manganaga manga kananaga kananaga kananaga kananaga kananaga kananaga kananaga kananaga kananaga kanana	
	(Name)	(Address)					
X	YOU ARE COMMANDED to appear to testify before the Hearing Examiner of the State Officers Electoral Board on <u>January 3, 2014</u> , at <u>9:00 o'clock a.m.</u> , at the Thompson Center, State of Illinois Building, 100 W. Randolph, Suite 14-100, Chicago, Illinois 60601.						
	YOU ARE COMMANDED to post objects at the place, date and						
	R FAILURE TO APPEAR IN RI SHMENT FOR CONTEMPT O					T YOU T	О
		Issued	: Da	te:			asservation and the design of the second
Attor	ney Name: Odelson & Sterk, Ltd	l .	By				
Addre	ney For: Objectors ess: 3318 W. 95 th Street Evergreen Park, IL 60805 hone: 708/424-5678		·	Jesse	R. Smart man, Electo	ral Board	
		PROOF C)F SERVIC	<u>E</u>			
(certi	, being fi fied mail, return receipt requeste , 2013.	rst duly sworn ed/handling a o	, depose and copy) to	l state that	I served this	s subpoen	a by on
	CRIBED AND SWORN to before day of, 20			**************************************			
****************	Notary Public	THE PROPERTY OF THE PROPERTY O					

	HELLE WHARTON, BRI LING-YI MARGOT WAN		I,)			
	Petitioners	s-Objectors,)			
v.)	No. 1	3 SOEB GP 511	
TIO	HARDIMAN and BRUNE	LL DONALD,)			
	Responde	nts-Candidates.)			
		SUB	POENA			
To:	Dwight McConnell, 3300 V (Name)	W. Maypole Avent (Address)	ue, #220, (Chicag	so, IL 60624	
X	YOU ARE COMMANDED to appear to testify before the Hearing Examiner of the State Officers Electoral Board on <u>January 3, 2014</u> , at <u>9:00 o'clock a.m.</u> , at the Thompson Center, State of Illinois Building, 100 W. Randolph, Suite 14-100, Chicago, Illinois 60601.					
					and copying of the following documents uments, objects and place of inspection):	
	R FAILURE TO APPEAR II SHMENT FOR CONTEMP				ENA MAY SUBJECT YOU TO Y LAW.	
		Issued	d:	Date:		
Attor Addr City:	ney Name: Odelson & Sterk ney For: Objectors ess: 3318 W. 95 th Street Evergreen Park, IL 60805 hone: 708/424-5678			Ву:	Jesse R. Smart Chairman, Electoral Board	
		PROOF (OF SERV	<u>ICE</u>		
(certi	fied mail, return receipt requ, 2013.	ng first duly swori uested/handling a	n, depose copy) to _	and st	ate that I served this subpoena byon	
	SCRIBED AND SWORN to I					
	Notary Public					

	HELLE WHARTON, BRENDA F. SM ING-YI MARGOT WANG,	IITH,))			
	Petitioners-Objectors,)			
v.)	No. 1	3 SOEB GP 511	
TIO H	HARDIMAN and BRUNELL DONAL	. D ,)			
	Respondents-Candida	tes.			
	<u>.</u>	<u>SUBPOEN</u>	<u>IA</u>		
To:	Beverly Smith, 8233 S, Ingleside Avenu (Name) (Address		IL 60619		
X	YOU ARE COMMANDED to appear to testify before the Hearing Examiner of the State Officers Electoral Board on <u>January 3, 2014</u> , at <u>9:00 o'clock a.m.</u> , at the Thompson Center, State of Illinois Building, 100 W. Randolph, Suite 14-100, Chicago, Illinois 60601.				
	YOU ARE COMMANDED to produce a of objects at the place, date and time spec	-	•		
	R FAILURE TO APPEAR IN RESPONS SHMENT FOR CONTEMPT OF COUR				
	I	ssued:	Date:		
Attorn	ney Name: Odelson & Sterk, Ltd.		By:		
	ney For: Objectors		V	Jesse R. Smart	
City:	ss: 3318 W. 95 th Street Evergreen Park, IL 60805 none: 708/424-5678			Chairman, Electoral Board	
	PRO	OF OF SE	RVICE		
	, being first duly s lied mail, return receipt requested/handli , 2013.	sworn, depoing a copy)	ose and sta to	ate that I served this subpoena byon	
	CRIBED AND SWORN to before me day of, 2013.				
	Notory Public				

	IELLE WHARTON, BRENDA I ING-YI MARGOT WANG,	F. SMITH,)		
	Petitioners-Object	tors,		
v.)	No. 1	3 SOEB GP 511
TIO F	HARDIMAN and BRUNELL DO	NALD,		
	Respondents-Can	didates.		
		SUBPOEN	<u>IA</u>	
To:	Carla Clair, 7457 S. Coles Avenue (Name) (Ad	, Chicago, IL 600 Idress)	649	
X		14, at <u>9:00 o'cloc</u>	<u>k a.m.,</u> at	Hearing Examiner of the State Officers the Thompson Center, State of Illinois 0601.
				and copying of the following documents uments, objects and place of inspection):
	R FAILURE TO APPEAR IN RESP SHMENT FOR CONTEMPT OF C			
		Issued:	Date:	We de the second
Attorn Addre City:	ney Name: Odelson & Sterk, Ltd. ney For: Objectors ss: 3318 W. 95 th Street Evergreen Park, IL 60805 none: 708/424-5678		Ву:	Jesse R. Smart Chairman, Electoral Board
		PROOF OF SE	RVICE	
(certif	, being first of ied mail, return receipt requested/h, 2013.			
	CRIBED AND SWORN to before m			
	Notary Public			

	IELLE WHARTON, BRENDA F ING-YI MARGOT WANG,	SMITH,)			
	Petitioners-Object	tors,			
v.)	No. 1	3 SOEB GP 511	
TIO F	HARDIMAN and BRUNELL DO	NALD,			
	Respondents-Can) didates.)			
	110000000000000000000000000000000000000	ŕ			
		<u>SUBPOE</u>	<u>INA</u>		
To:	Ferial Jackson, 1304 S. 9th Avenue. (Name) (Add	<u>Maywood, IL</u> dress)	60153	· · · · · · · · · · · · · · · · · · ·	
X	YOU ARE COMMANDED to appear to testify before the Hearing Examiner of the State Officers Electoral Board on <u>January 3, 2014</u> , at <u>9:00 o'clock a.m.</u> , at the Thompson Center, State of Illinois Building, 100 W. Randolph, Suite 14-100, Chicago, Illinois 60601.				
				and copying of the following documents uments, objects and place of inspection):	
	R FAILURE TO APPEAR IN RESPONDED				
	•	Issued:	Date:		
Attori	ney Name: Odelson & Sterk, Ltd.		By:		
	ney For: Objectors		-	Jesse R. Smart	
City:	ess: 3318 W. 95 th Street Evergreen Park, IL 60805 hone: 708/424-5678			Chairman, Electoral Board	
		PROOF OF SI	ERVICE		
τ	, being first c	luk eworn dar	noce and st	ate that I served this submoona hy	
(certif	fied mail, return receipt requested/h	andling a copy) to	on	
	CRIBED AND SWORN to before m	e			
***************************************	Notary Public				

	HELLE WHARTON, BRENDA F LING-YI MARGOT WANG,	SMITH,)			
	Petitioners-Object	tors,			
v.)	No. 1	3 SOEB GP 511	
TIO	HARDIMAN and BRUNELL DO	j.			
	Respondents-Can	•	INT A		
		SUBPOE	INA		
To:	Bobby Hamilton, 3337 W. Madison (Name) (Add	<u>1 Street, Chica</u> dress)	go, IL 6062	24	
X	YOU ARE COMMANDED to app Electoral Board on <u>January 3, 201</u> Building, 100 W. Randolph, Suite 1	<u>4, at 9:00 o'cle</u>	ock a.m., at	the Thompson Cente	
	YOU ARE COMMANDED to prod of objects at the place, date and time				
	R FAILURE TO APPEAR IN RESPO ISHMENT FOR CONTEMPT OF CO				YOU TO
		Issued:	Date:	No. and the second seco	
	rney Name: Odelson & Sterk, Ltd.		By:	Jesse R. Smart	
Addr City:	ress: 3318 W. 95th Street Evergreen Park, IL 60805 phone: 708/424-5678			Chairman, Electora	l Board
		PROOF OF S	ERVICE		
(certi	, being first diffied mail, return receipt requested/h	uly sworn, de andling a copy	pose and star) to	ate that I served this s	ubpoena by on
	SCRIBED AND SWORN to before m day of, 2013.	e	-		
	Notary Public				

	IELLE WHARTON, BREN ING-YI MARGOT WANG		[,))		
	Petitioners-	Objectors,)		
v.) No	. 13 SC	DEB GP 511
TIO H	IARDIMAN and BRUNEL	L DONALD,)		
	Respondent	s-Candidates.)		
		<u>SUBI</u>	POENA		
To:	Derrick Jones, 1220 S. Homa		ago, IL 6062	3	
	(Name)	(Address)			
X		3, 2014, at 9:00	o'clock a.m	, at the	ring Examiner of the State Officers Thompson Center, State of Illinois 1.
					copying of the following documents nts, objects and place of inspection):
	R FAILURE TO APPEAR IN SHMENT FOR CONTEMPT				
		Issued	l: Da	te:	
Attorn	ey Name: Odelson & Sterk, I	.td	Ву		
	ney For: Objectors	au.	лу		se R. Smart
Addre City:	ss: 3318 W. 95 th Street Evergreen Park, IL 60805 none: 708/424-5678				airman, Electoral Board
		PROOF (OF SERVIC	<u>E</u>	
(certif	, being, being ied mail, return receipt reque, 2013.	first duly sworn sted/handling a	n, depose and copy) to	l state t	hat I served this subpoena byon
	CRIBED AND SWORN to be,				
California	Notary Public		•		

	HELLE WHARTON, BRENDA F. SMITH LING-YI MARGOT WANG,	,))	
	Petitioners-Objectors,)	
v.)) No. 1	3 SOEB GP 511
TIOI	HARDIMAN and BRUNELL DONALD,)	
	Respondents-Candidates.)	
	SUBI	<u>POENA</u>	
To:	Angela Balls, 3440 W. Franklin Blvd., Chica (Name) (Address)	go, IL 60624	
X	YOU ARE COMMANDED to appear to tes Electoral Board on <u>January 3, 2014</u> , at <u>9:00</u> Building, 100 W. Randolph, Suite 14-100, Cl	o'clock a.m., a	t the Thompson Center, State of Illinoi
	YOU ARE COMMANDED to produce and peof objects at the place, date and time specified		
	R FAILURE TO APPEAR IN RESPONSE TO SHMENT FOR CONTEMPT OF COURT AS		
	Issued	: Date:	
	ney Name: Odelson & Sterk, Ltd.	By:	
Addre City:	ney For: Objectors ess: 3318 W. 95 th Street Evergreen Park, IL 60805 hone: 708/424-5678		Jesse R. Smart Chairman, Electoral Board
	PROOF (OF SERVICE	
(certi	, being first duly sworn fied mail, return receipt requested/handling a, 2013.	a, depose and st	tate that I served this subpoena byon
SUBS	SCRIBED AND SWORN to before me	· And Angle of the	4.0
	, 2013.		
•	Notary Public		

MICHELLE WHARTON, et. al)		
)		
Objector,)		
)		
V.)	No.	13 SOEB GP 511
)		
TIO HARDIMAN, et. al.,)		
)		
Candidate.)		

NOTICE OF FILING

To: State Officers Electoral Board c/o Steve Sandvoss
100 W. Randolph St., 14-100
Ssandvoss@elections.il.gov

Barbara Goodman Burton S. Odelson barb@barbgoodmanlaw.com 3318 W. 95th Street

Some Care

Burton S. Odelson 3318 W. 95th Street Evergreen Park, IL attyburt@aol.com

Please take notice that on December 24, 2013, I filed the attached Response to the Objectors' Request for Subpoenas with the State Officers Electoral Board.

CERTIFICATE FOR SERVICE

The undersigned attorney hereby certifies that copies of the attached Response to the Objectors' Request for Subpoenas were served upon the above-referenced party(ies) at the address indicated by the facsimile transmission, mail or in person on December 24, 2013.

Randy Crumpton 70 West Madison St., Suite 1400 Chicago, Illinois 60602 312-214-3327 312-214-3341 Fax rancrump@aol.com

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING AND PASSING UPON OF OBJECTIONS TO NOMINATION PAPERS OF CANDIDATES FOR ELECTION TO THE OFFICE OF GOVERNOR AND LIEUTENANT GOVERNOR IN THE STATE OF ILLINOIS

MICHELLE WHARTON, et. al.,)		
)		
Objector,)		
)		
v.)	No.	13 SOEB GP 511
)		
TIO HARDIMAN, et. al.,)		
)		
Candidate.)		

RESPONSE TO OBJECTOR'S REQUEST FOR SUBPOENAS

NOW COMES the Candidate, by attorney, Randy Crumpton, and in response to the Objectors' Request For Subpoenas, state as follows:

- 1. The Objectors pattern of fraud allegation is without merit.
- 2. Objectors are requesting that 19 subpoenas be issued, so that they can go on fishing expedition.
- 3. In support of their Request they attach 3 petition sheets of the 603 sheets filed by the Candidate, which contains 75 signatures of the 286 signatures that Timothy Lee circulated. The Candidate turned in 9,342 signatures according to State Board of Elections employees. This is their basis for subpoenaing 18 other circulators.
- 4. The Objectors state, "each of the circulators has many signatures on their sheets which are not the true and correct signature of the purported person", however, they give no specifics for each circulator. How many signatures were challenged for not being genuine, and of that number, how many were sustained or overruled during the Records Examination by Board Employees?

5. Clearly, case law requires that the Objectors provide more evidence then what has

been presented in their Request.

6.

The Objectors attempt to modify their Verified Objectors' Petition in seeking to

subpoena Thomas Mastin. In paragraph 21 of the Verified Objectors' Petition, they list the

alleged circulators whom they claim their petition sheets demonstrate a pattern of fraud. Mr.

Mastin's name is not included in paragraph 21 nor is it included anywhere else in the petition.

Therefore, any request to subpoena Mr. Mastin has to be denied outright.

7. Likewise, the subpoena to Angela Balls must be denied. Objectors have presented

no evidence to show that the circulator's affidavit is false and that their allegation that Angela

Balls "does not exist" is correct.

8. With regards to Derrick Jones and Bobby Hamilton, the Objectors have not

presented any evidence to show that circulators do not live at the address listed in their affidavits.

9. The parties appeared before the hearing officer on December 20, 2013, the hearing

was set on that date and the attorney for the Objectors was fully aware of the procedures for

subpoenas and agreed to the January 3, 2013 hearing date.

WHEREFORE for the foregoing reasons the Candidate respectfully requests that the

Objectors' Request for Subpoenas be denied, or in the alternative be limited and any request to

subpoena Thomas Mastin be denied. Finally, that the hearing date remain the same.

Respectfully submitted,

Randy Crumpton

Randy Crumpton

70 West Madison, Suite 1400

Chicago, Illinois 60602

Phone: (312) 214-3327 Fax: (312) 214-3341

rancrump@aol.com

Mullen v. Goel, 13SOEBGP514

From: philip krasny [mailto:philipkrasny@yahoo.com]

Sent: Friday, December 27, 2013 10:25 AM

To: Sandvoss, Steve

Cc: john@fogartylawoffice.com; anish@plgfirm.com **Subject:** Re: Subpoena Requests, Mullen v. Goel

Mr. Sandvoss:

Based upon a review of the objector's petition, it is my recommendation that the Board grant the subpoena requests. PLEASE NOTE THAT A HEARING IS SCHEDULED FOR JANUARY 3, 2014 AT 10:00 A.M. AT THE SBOE OFFICE IN CHICAGO. PLEASE HAVE THE RETURN DATE AND TIME CORRESPOND TO THE HEARING DATE.

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING AND PASSING UPON OBJECTIONS TO THE NOMINATION PAPERS FOR CANDIDATES FOR THE OFFICE OF REPRESENTATIVE IN CONGRESS FROM THE 8th CONGRESSIONAL DISTRICT FOR THE STATE OF ILLINOIS

Patrick J. Mullen,)	
Petitioner-Objector,))) 13 SOEBGP 514	
VS.		
Manju Goel,		
Respondent-Candidate.		

OBJECTOR'S REQUEST FOR SUBPOENAS

Now comes the Objector, Patrick J. Mullen, and by and through his attorney, requests the following subpoenas:

1. Person:

Mike Martin 935 25th Street Moline, IL 61265

Purpose: To obtain evidence demonstrating that Mr. Martin engaged in a pattern of fraud in circulating sheet nos. 34-48, 54-63, 89, 123-125, 134, 140, 145, 149-151, 154, 155, 160, 169 and 17, as it appears that numerous signatures on these sheets are not genuine and were written by the same hand, in which case he would not have witnessed each individual signing his/her name as he purports to have done in his circulator's affidavit.

Why it is relevant to the objection: If Mr. Martin engaged in a pattern of fraud, all of his sheets should be stricken from Candidate's nominating petitions and not counted.

2. Person:

Rajeev Goel 661 Inverness Drive

Aurora, IL 60504

Purpose: To obtain evidence demonstrating that Mr. Goel engaged in a pattern of fraud in circulating sheet nos. 1-3, 8-11, 27, 64-76, 88, 96, 97, 108, 109, 135, 137-139, 141, 143, 144, 162, 168 and 174. 17-20, as it appears that numerous signatures on these sheets are not genuine and were written by the same hand, in which case he would not have witnessed each individual signing his/her name as he purports to have done in his circulator's affidavit.

Why it is relevant to the objection: If Mr. Goel engaged in a pattern of fraud, all of his sheets could be stricken from his nominating petitions and not counted.

3. Person:

Manju Goel

661 Inverness Drive Aurora, Illinois 60504

Purpose: To obtain evidence demonstrating that Ms. Goel engaged in a pattern of fraud in circulating sheets nos. 6, 33, 110-118, 122, 163 and 166, as it appears that numerous signatures on these sheets are not genuine and were written by the same hand, in which case she would not have witnessed each individual signing his/her name as she purports to have done in her circulator's affidavit..

Why it is relevant to the objection: If Ms. Goel engaged in a pattern of fraud, all of her sheets could be stricken from Candidate's nominating petitions and not counted.

4. *Person*:

Amitabh Mittal

Address under investigation Bartlett, Illinois 60103

Purpose: To obtain evidence demonstrating that Mr. Mittal did not properly witness and sign the petition pages he purports to have notarized.

Why it is relevant to the objection: If Mr. Mittal did not properly notarize the petitions he is alleged to have notarized, all of those sheets should be stricken from Candidate's nominating petitions and not counted.

WHEREFORE, the Objector, Patrick J. Mullen, prays this Honorable Electoral Board grant his request for the aforesaid subpoenas.

Respectfully Submitted,

Patrick J. Mullen Objector

By:

/s/ John G. Fogarty, Jr. /s/

One of her attorneys

John G. Fogarty, Jr. Law Office of John Fogarty, Jr. 4043 N. Ravenswood, Suite 226 Chicago, Illinois 60613 (773) 549-2647 (office) (773) 680-4962 (mobile) (773) 681-7147 (fax) john@fogartylawoffice.com IL ARDC# 6257898

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING AND PASSING UPON OBJECTIONS TO THE NOMINATION PAPERS FOR CANDIDATES FOR THE OFFICE OF REPRESENTATIVE IN CONGRESS FROM THE 8th CONGRESSIONAL DISTRICT FOR THE STATE OF ILLINOIS

Patri	ck J. Mullen,)			
Petit	ioner-Objector,)))	NDCD 514		
vs.) 13 SOE	CBGP 514		
Man	ju Goel,)			
Resp	ondent-Candidate.)			
To:	Mike Martin 935 25 th Street Moline, IL 61265				The second second
	SUBP	OENA (DUCES T	ГЕСИМ)		
Janua pursu Regu withi	YOU ARE HEREBY COMMAN ections sitting as the State Officers ary, 2014,:00 A.M., and to the provisions of Section 1 lations of the State Board of Election proceeding. YOU ARE COMMANDED ALSO ession or control related to your circums.	Electoral Board, 100 West Randol 0-8 et seq. of the ions in furtherance	Barb Philip K lph Street, Su Illinois Elect the thereof to proposed to pro- owing: Any a	Krasny Hearing I ite 14-100, Chic ion Code and the resent evidence I nd all docume	Examiner, on cago, Illinois ne Rules and bearing upon
			SS, State Off y of Illinois La	ficers Electoral	Board under
		Ву:		(Seal)	
Attor	e: John Fogarty, Jr. ney for: Objector Registration No.: 6257898			(Sour)	

Address: 4043 N. Ravenswood, Suite 226

City: Chicago, IL 60613 Phone: 773-549-2647

PROOF OF SERVICE

I served this Subpoena by	handing a copy to	on	
I paid the witness	for witness, mileage, and	d fees.	
F			
Signed and sworn before me			
•	• • •		
this day of	, <u>201</u> .		
Notary Public			

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING AND PASSING UPON OBJECTIONS TO THE NOMINATION PAPERS FOR CANDIDATES FOR THE OFFICE OF REPRESENTATIVE IN CONGRESS FROM THE 8th CONGRESSIONAL DISTRICT FOR THE STATE OF ILLINOIS

Patric	k J. Mullen,)	
Petitioner-Objector, vs. Manju Goel,)	42 COEDCD 544
)	13 SOEBGP 514
)	
Respo	ndent-Candidate.)	
То:	Rajeev Goel 661 Inverness Aurora, IL 61265		
	SU	JBPOENA (D	UCES TECUM)
Januar pursua Regula within	ctions sitting as the State Officy, 2014,:00 A.M. and to the provisions of Sectionations of the State Board of Exproceeding. YOU ARE COMMANDED A	icers Electoral M., 100 West on 10-8 et seq Elections in fun ALSO to bring	ppear to give your testimony before the State Board Board, Barb Philip Krasny Hearing Examiner, on Randolph Street, Suite 14-100, Chicago, Illinois I of the Illinois Election Code and the Rules and ortherance thereof to present evidence bearing upon the following: Any and all documents in your cominating petitions for Manju Goel.
			WITNESS, State Officers Electoral Board under authority of Illinois Law.
Attorn	John Fogarty, Jr. ey for: Objector egistration No.: 6257898		By:(Seal)

Address: 4043 N. Ravenswood, Suite 226

City: Chicago, IL 60613 Phone: 773-549-2647

PROOF OF SERVICE

I served this Subpoena b	by handing a copy to		on	
I paid the witness	for witness, mileag	ge, and fees.		
Signed and sworn before me	_			
this day of	<u>, 201</u>			
N-4 D-1!:-				
Notary Public				

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING AND PASSING UPON OBJECTIONS TO THE NOMINATION PAPERS FOR CANDIDATES FOR THE OFFICE OF REPRESENTATIVE IN CONGRESS FROM THE 8th CONGRESSIONAL DISTRICT FOR THE STATE OF ILLINOIS

Patri	ck J. Mullen,)			
Petitioner-Objector, vs.)	42 GOFD CD 544		
)	13 SOEBGP 514		
Manj	ju Goel,)			v 7
Resp	ondent-Candidate.)			
То:	Manju Goel 661 Inverness Aurora, IL 61265				B. C.
	SU	JBPOENA	(DUCES TECUM)		
Janua pursu Regu within	ections sitting as the State Offing, 2014,:00 A.M. and to the provisions of Section lations of the State Board of En proceeding. YOU ARE COMMANDED A ession or control related to your control related to your control.	M., 100 We on 10-8 et solections in LSO to bring	est Randolph Street, S seq. of the Illinois Elec- furtherance thereof to p ang the following: Any	uite 14-100, Chicago, etion Code and the Ru present evidence bearing and all documents	Illinois ales and ng upon
			WITNESS, State O authority of Illinois I	fficers Electoral Board aw.	d under
			Ву:	(Seal)	
Attor	e: John Fogarty, Jr. ney for: Objector			` '	•

Atty Registration No.: 6257898

Address: 4043 N. Ravenswood, Suite 226

City: Chicago, IL 60613 Phone: 773-549-2647

PROOF OF SERVICE

I served this Subpoena by handing a copy		on	
I paid the witness	for witness, mileag	ge, and fees.	
	_		
Signed and sworn before me			
this day of	, <u>201</u> .		
Notary Public	2		

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING AND PASSING UPON OBJECTIONS TO THE NOMINATION PAPERS FOR CANDIDATES FOR THE OFFICE OF REPRESENTATIVE IN CONGRESS FROM THE 8th CONGRESSIONAL DISTRICT FOR THE STATE OF ILLINOIS

Patri	ck J. Mullen,)	
Petitioner-Objector, vs.)	13 SOEBGP 514
)	
Manj	ju Goel,)	
Resp	ondent-Candidate.)	
To:	Amitabh Mittal		
	Bartlett, IL 60103		
	SUB	POENA (DUCES TECUM)
Janua pursu Regu within	ary, 2014,:00 A.M., ant to the provisions of Section lations of the State Board of Electroproceeding.	, 100 Wes 10-8 et se etions in f	al Board, Barb Philip Krasny Hearing Examiner, on st Randolph Street, Suite 14-100, Chicago, Illinois eq. of the Illinois Election Code and the Rules and furtherance thereof to present evidence bearing upon g the following: Any and all documents in your minating petitions for Manju Goel.
			WITNESS, State Officers Electoral Board under authority of Illinois Law.
			By:
Attor	e: John Fogarty, Jr. ney for: Objector Registration No.: 6257898		(Seal)

Address: 4043 N. Ravenswood, Suite 226

City: Chicago, IL 60613 Phone: 773-549-2647

PROOF OF SERVICE

I served this Subpoena	by handing a copy to	on	
I paid the witness	for witness, mileas	age, and fees.	
Signed and sworn before me	-		
this day of	<u>, 201</u>		
Notary Public			